

IN THE UNITED STATES BANKRUPTCY COURT DISTRICT OF NEW JERSEY Caption in Compliance with D.N.J. LBR 9004-2(c)	
James DiMaggio, Esq. Keaveney Legal Group, LLC 1000 Maplewood Dr Suite 202 Maple Shade, NJ 08052 800-219-0939 Email: jdimaggio@keaveneylegalgroup.com Attorney for the Debtor	
In Re: Regina M. Dever Debtor.	Case No: 20-15459-ABA Chapter: Chapter 13 Judge: Andrew B. Altenburg Jr.

**CERTIFICATION IN SUPPORT OF MOTION TO WITHDRAW AS COUNSEL
FOR DEBTOR**

AND NOW comes the undersigned attorney, James DiMaggio, on behalf of Keaveney Legal Group pursuant to D.N.J. LBR 9010-2, hereby moves to withdraw as counsel for the Debtor in the above referenced caption and for cause avers the following:

1. On April 9, 2020, Regina M. Dever (hereinafter “Debtor”) filed her Voluntary Chapter 13 Petition (Docket 1) in the United States Bankruptcy Court for the District of New Jersey, bearing case number 20-15459-ABA.
2. On August 10, 2021, Creditor, Carrington Mortgage, filed a certification of Default alleging that the Debtor was past due with her post-petition obligations.
3. On August 20, 2021, the Debtor filed a response stating that she was recently hospitalized and out work due to Covid 19 and requested that be able to enter into a repayment plan or have the arrears recapitalized into her bankruptcy plan. The

Certification in Response filed by the Debtor was hand-written and signed by the Debtor:

From: regina deyer <gnd1369@hotmail.com>
Sent: Friday, August 20, 2021 7:22 PM
To: James DiMaggio <jdimaggio@keaveneylegalgroup.com>
Subject: Ch 13

[This email originated from outside of your organization. Do not click links or open attachments unless you were expecting the message and know the content is safe.]

☐ Payments have not been made for the following reasons and debtor proposes repayment as follows (explain your answer):

☒ Other (explain your answer):

I was recently hospitalized and out 9 weeks due to COVID 19. I anticipate going back to work within the next 2 weeks. I would like to either enter into a repayment plan or capitalize my arrears into the bankruptcy.

3. This certification is being made in an effort to resolve the issues raised in the certification of default or motion.
4. I certify under penalty of perjury that the above is true.

Date: 8/20/21

Regina Deyer
Debtor's Signature

4. On October 12, 2021, I appeared in front of an order Judge Altenburg for the Certification of Default hearing and notified the judge and opposing counsel that the Debtor recently requested a forbearance plan for her missed payment.

5. On October 25, 2021, Judge Altenburg entered an order requiring the Debtor to pay her arrears at the conclusion of her forbearance or by January 12, 2022.

6. On or around February 16, 2022, Keaveney Legal Group was notified by Carrington Mortgage that the Debtor filed a complaint with the Consumer Financial Protection Bureau against Keaveney Legal Group alleging that Keaveney Legal Group entered into an order to repay her arrears without her consent. See attached letter from Carrington Mortgage attached as Exhibit "A".

7. On or around February 17, 2022, Keaveney Legal Group sent a letter to the Debtor outlining all communications that took place regarding the Certification of

Default and refuting the Debtor's allegations regarding entering into an agreement without her consent. See Letter sent to Debtor attached as Exhibit "B".

WHEREFORE, as a result of the Debtor's allegations and potential conflicts in interest, Keaveney Legal Group seeks on order withdrawing from representing the Debtor in her Chapter 13 case,

Respectfully Submitted,

/s/ James DiMaggio, Esq.
Keaveney Legal Group
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Maple Shade, NJ 08052
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Facsimile: (856) 282-1090
Attorney for the Debtor

Date: 4/19/2022